

EXHIBIT B

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CLEAN ENERGY CHOICE COALITION, NFP

Plaintiff,

v.

VILLAGE OF OAK PARK, ILLINOIS,

Defendant.

Case No. 1:25-cv-04353
Hon. Franklin U. Valderrama

**DECLARATION OF MARTIN DURKAN IN SUPPORT OF PLAINTIFF'S MOTION
FOR SUMMARY JUDGMENT**

I, Martin Durkan, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that I have personal knowledge of the following facts, which are true and correct:

1. I am over eighteen years of age and make this declaration based on information personally known to me.
2. I have personal knowledge of the facts stated herein and, if called as a witness, could and would testify competently to them.
3. I submit this Declaration in support of Plaintiff Clean Energy Choice Coalition, NFP's Motion for Summary Judgment.
4. I am Assistant to the President at International Union of Operating Engineers Local 150, AFL-CIO ("Local 150"), and have served in that role since December 2023.
5. Local 150 is a member of Clean Energy Choice Coalition, NFP.
6. Local 150 is a labor organization representing nearly 24,000 working men and women, primarily in northeastern Illinois.
7. Local 150 and its members operate heavy equipment in various industries, including utility installation and maintenance, road construction, building construction, and many

others.

8. Local 150 members receive specialized training on natural-gas distribution and maintenance processes and perform this work regularly.

9. The Village of Oak Park's Ordinance eliminates significant work opportunities for Local 150 members, directly resulting in job losses, wage reductions, and economic instability.

10. As a result of the Ordinance, numerous natural-gas projects in Oak Park have been canceled or significantly curtailed, leading to a diminished market for Local 150's skilled heavy equipment operators.

11. As existing buildings in Oak Park are gradually replaced with new buildings that (due to the Ordinance) cannot use natural gas, the jobs available for Local 150 operators will be continuously and permanently reduced.

12. Local 150 operators have suffered and will continue to suffer serious harms, including lost customers, sales, and revenue; loss of employment; and increased expenses. Such expenses cannot be recouped, which makes Local 150 operators' financial suffering an irreparable harm.

13. Money damages will not adequately remedy the harm already caused by the Ordinance to Local 150 operators, and the harm that the Ordinance will continue to cause.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on this 26th day of August, 2025 in Countryside, Illinois.

A handwritten signature in blue ink, appearing to read "Martin Durkan", is written over a solid horizontal line.

Martin Durkan